

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

TERESA READNOWER,

Plaintiff

v.

C-1-01-654

IONICS, INC.,

Defendant

**SPECIAL VERDICTS**

We, the jury, unanimously determine our Special Verdict as follows:

1. Did plaintiff prove by the preponderance of the legal evidence that she engaged in protected activity by opposing unlawful employment discrimination by defendant?

  X   YES            NO

Proceed to answer Special Verdict No. 2.

2. Did plaintiff prove by the preponderance of the legal evidence that she engaged in protected activity by exercising her rights under the Family and Medical Leave Act?

  X   YES            NO

-2-

IF YOU ANSWERED YES TO EITHER SPECIAL VERDICT NO. 1 OR SPECIAL VERDICT NO. 2, PROCEED TO SPECIAL VERDICT NO. 3. IF YOU ANSWERED NO TO BOTH SPECIAL VERDICT NO. 1 AND SPECIAL VERDICT NO. 2, PROCEED TO SIGN THE SPECIAL VERDICT FORM.

3. Did plaintiff prove by the preponderance of the legal evidence that defendant knew plaintiff engaged in protected activity?

X YES \_\_\_\_\_ NO

IF YOU ANSWERED YES TO SPECIAL VERDICT NO. 3, PROCEED TO SPECIAL VERDICT NO. 4. IF YOU ANSWERED NO TO SPECIAL VERDICT NO. 3, PROCEED TO SIGN THE SPECIAL VERDICT FORM.

4 Did plaintiff prove by the preponderance of the legal evidence that there was a causal connection between plaintiff's opposition to unlawful employment discrimination and the termination of her employment?

X YES \_\_\_\_\_ NO

Proceed to answer Special Verdict No. 5.

-3-

5. Did plaintiff prove by the preponderance of the legal evidence that there was a causal connection between the exercise of plaintiff's rights under the Family and Medical Leave Act and the termination of her employment?

\_\_\_\_\_ YES        X   NO

IF YOU ANSWERED YES TO EITHER SPECIAL VERDICT NO. 4 OR SPECIAL VERDICT NO. 5, PROCEED TO SPECIAL VERDICT NO. 6. IF YOU ANSWERED NO TO BOTH SPECIAL VERDICT NO. 4 AND SPECIAL VERDICT NO. 5, PROCEED TO SIGN THE SPECIAL VERDICT FORM.

6. Did plaintiff prove by the preponderance of the legal evidence that the reasons given by defendant for terminating plaintiff's employment were pretextual?

  X   YES      \_\_\_\_\_ NO

IF YOU ANSWERED YES TO SPECIAL VERDICT NO. 6, PROCEED TO SPECIAL VERDICT NO. 7. IF YOU ANSWERED NO TO SPECIAL VERDICT NO. 6, PROCEED TO SIGN THE SPECIAL VERDICT FORM.

-4-

7. What amounts of damages, if any, did plaintiff prove by the preponderance of the legal evidence were directly caused by defendant's termination of her employment?

a. Back pay

~~\$~~ 128320 <sup>00</sup>

b. Front pay

0

c. Other Compensatory Damages

0

8. Did defendant prove by the preponderance of the legal evidence that plaintiff failed to mitigate her damages?

           YES

  X   NO

IF YOU ANSWERED YES TO SPECIAL VERDICT NO. 8, PROCEED TO SPECIAL VERDICT NO. 9. IF YOU ANSWERED NO TO SPECIAL VERDICT NO. 8, DO NOT ANSWER SPECIAL VERDICT NO. 9 AND PROCEED TO SPECIAL VERDICT NO. 10.

9. What is the amount defendant proved by the preponderance of the legal evidence should be deducted from plaintiff's damages because of plaintiff's failure to mitigate her damages?

\$ 0

-5-

10. Did plaintiff prove by clear and convincing legal evidence that defendant terminated plaintiff's employment with actual malice or with reckless indifference to plaintiff's known rights?

\_\_\_\_\_ YES        X   NO

IF YOU ANSWERED YES TO SPECIAL VERDICT NO. 10, PROCEED TO SPECIAL VERDICT NO. 11. IF YOU ANSWERED NO TO SPECIAL VERDICT NO. 10, PROCEED TO SIGN THE VERDICT FORM.

-6-

11. What amount of money, if any, do you award to plaintiff for punitive damages

- a) because she was terminated in retaliation for exercising her rights under the Family and Medical Leave Act:

\$ 0

- b) because she was terminated in retaliation for other protected activity:

\$ 0

Gloria J Chase  
Ginnette Caluigon  
Forbes Sue Hoop  
Betty Bally

Josephine Taylor  
Karen Moya  
Linda Alaris  
Mild K. Glavin

12/17/03  
Date